



COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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George Dean, Esq.
Foley, Hoag
One Post Office Square
Boston, Massachusetts 02109

BY FAX AND U.S. MAIL

RE: Boston Edison Company, D.T.E. 01-108

February 4, 2002

Dear Mr. Dean:

Enclosed please find the Department's fourth set of information requests on the above-captioned matter. Responses should be filed on or before February 11, 2002. If you have any questions, please feel free to contact me at (617) 305-3620.

Sincerely,

William H. Stevens, Jr.
Hearing Officer

cc: Mary Cottrell
Staff as assigned
Service List

Encl.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

BOSTON EDISON
COMPANY

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D.T.E. 01-108

FOURTH SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
MASSACHUSETTS WATER RESOURCES AUTHORITY

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Boston Edison Company and the Massachusetts Water Resources Authority the following information requests with respect to the above captioned matter.

Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to Boston Edison Company and the Massachusetts Water Resources Authority in this proceeding.

1. "BECo" or "Company" means Boston Edison Company, its officers, directors, employees, consultants, and attorneys.
2. "Company Filing" or "Filing" means all the documents BECo filed in this proceeding.
3. "MWRA" means the Massachusetts Water Resources Authority.
4. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
5. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
6. These requests shall be deemed continuing so as to require further supplemental responses if the Company or MWRA or their witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
7. The phrase "provide complete and detailed documentation" means provide all data,

assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.

8. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
9. If the Company or MWRA finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
10. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) William Stevens, Legal Division; (2) Owen Cahillane, Rates and Revenues Requirements Division; (3) Claude Francisco, Rates and Revenues Requirements Division; (4) Sean Hanley, Rates and Revenues Requirements Division.

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D.T.E. 01-108

FOURTH SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
MASSACHUSETTS WATER RESOURCES AUTHORITY

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits the Massachusetts Water Resources Authority the following information requests. The following questions pertain to the pre-filed testimony ("Testimony") of Lee Smith filed by the Massachusetts Water Resources Authority ("MWRA") with the Department on January 25, 2002.

- DTE-4-01 In reference to the Testimony of Lee Smith at 3, please elaborate on the statement that the electric service provided to the Deer Island facility does not use Boston Edison's distribution system.
- DTE-4-02 In reference to the Testimony of Lee Smith at 3-4, please:
(a) list and describe the "facilities and maintenance costs" of the 115 KV cable;
(b) provide for each item of costs described in (a) above the annual charges paid by MWRA to Boston Edison from 1997 through 2001;
(c) state whether the costs listed and described in (a) above are separate and distinct from the charges under the Rate WR.
- DTE-4-03 In reference to the Testimony of Lee Smith at 4, please: (a) elaborate on the statement that "the embedded generation costs in Rate WR were less than those other rates;" and (b) provide a schedule that compares the Rate WR embedded generation costs with the other rates referred to.
- DTE-4-04 In reference to the Testimony of Lee Smith at 6, please provide supporting schedules showing how MWRA determined that: "MWRA incurs fully one-third of its Boston Edison costs at Deer island"
- DTE-4-05 In reference to the Testimony of Lee Smith at 6-7, please provide with supporting schedules the annual dollar and percentage discounts provided to MWRA from 1998 through 2001 if the costs associated with the delivery cable were included in the calculations.

- DTE-4-06 In reference to the Testimony of Lee Smith at 7, please provide supporting schedules and a copy of the contract used as the basis for the statement that MWRA “is required by contract to pay BECO a return on equity of 18.5 percent on the cable investment.”
- DTE-4-07 In reference to the Testimony of Lee Smith at 7, please provide a copy of the purchase and sale agreement for the 1994 purchase by MWRA from BECo of combustion turbines.